

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)
) Chapter 11
)
FRANCHISE GROUP, INC., ¹) Case No. 24-12480 (LSS)
)
Reorganized Debtor.) Re: Docket No. 1914
)

**CERTIFICATION OF COUNSEL REGARDING REVISED
PROPOSED ORDER SUSTAINING REORGANIZED DEBTORS'
FOURTH (4TH) OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO CLAIMS**

On November 17, 2025, the above-captioned reorganized debtor (the “Reorganized Debtor”) filed the *Reorganized Debtors’ Fourth (4th) Omnibus (Non-Substantive) Objection to Claims* [Docket No. 1914] (the “Objection”)² with the United States Bankruptcy Court for the District of Delaware (the “Court”). A proposed form of order sustaining the Objection was attached thereto as Exhibit 2 (the “Proposed Order”). Attached to the Proposed Order as Exhibits A and B respectively, were schedules of the (i) Late Claims and (ii) Wrong Debtor Claims subject to the Objection (each a “Schedule”).

The deadline for parties to file and serve responses to the relief requested in the Objection was established as December 8, 2025, at 4:00 p.m. (prevailing Eastern Time) (the “Response Deadline”). Prior to the Response Deadline, the Reorganized Debtor received informal comments from Munib Malik (“Respondent”). To facilitate discussions with Respondent, the Reorganized

¹ The last four digits of Franchise Group, Inc.’s federal tax identification number are 1876. The mailing address for Franchise Group, Inc. is 2371 Liberty Way, Virginia Beach, Virginia 23456. The term “Reorganized Debtors” includes Franchise Group, Inc. and certain reorganized debtor affiliates, a complete list of which, including the last four digits of their federal tax identification numbers and addresses, may be obtained on the website of the Reorganized Debtors’ claims and noticing agent, at <https://cases.ra.kroll.com/FRG/>. All of the motions, contested matters, and adversary proceedings that remained open as of the closing of any of the Reorganized Debtors’ cases, or that are opened after the date thereof, are administered in the remaining chapter 11 case of Franchise Group, Inc., Case No. 24-12480 (LSS).

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Objection.

Debtor has (i) revised the Proposed Order, attached hereto as **Exhibit 1** (the “Revised Proposed Order”), to remove Respondent’s claim from the Late Claims Schedule and (ii) adjourned the Objection solely as to Respondent’s claim to February 18, 2026, at 10:00 a.m. (prevailing Eastern Time). For the convenience of the Court and other interested parties, a blackline comparing the Revised Proposed Order against the Proposed Order is attached hereto as **Exhibit 2**. The Reorganized Debtor reserves any all rights, claims, and defenses with respect to Respondent’s claim and will provide the Court with an update on such claim, as may be appropriate.

WHEREFORE, as the Reorganized Debtor did not receive any objections or responses other than as described herein, the Reorganized Debtor respectfully requests that the Court enter the Proposed Order without further notice or a hearing at the Court’s earliest convenience.

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Dated: December 11, 2025
Wilmington, Delaware

/s/ Allison S. Mielke

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